

# **EXHIBIT J**

**From:** Phillip Young <phillip@thompsonburton.com>  
**Sent:** Fri, 16 Jul 2021 21:50:57 +0000  
**To:** Hahn, W.Patton  
**CC:** Hullett, Rita  
**Subject:** Re: Bucks County / DSI - Communication protected by Rule 408

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Patton & Rita:

Thank you for providing this proposed amended claim and the backup documentation. I also appreciate the time Patton spent on the phone with me earlier today clarifying a couple of questions we had about the claim.

The Trustee and I have now had an opportunity to review the claim, your calculations, and the documents that form the basis for your claims. After discussion, the Trustee and I agree that your amended claim appears valid and that your documentation supports the claimed amount. For that reason, the Trustee does not intend to object to your amended claim in the amount proposed in this attachment.

We anticipate filing a joint stipulation with the Delaware trustee early next week. Once that stipulation has been filed, along with a motion to approve that stipulation, we would ask you to file this amended claim in the Tennessee case and to withdraw the claims in the Delaware case. This will clear the path for a speedy and efficient resolution of the Trustee's claims in Delaware and a quick distribution to creditors of the Bucks County case.

Please call me next week with any questions.

**Thompson Burton PLLC**

*Redefining the Art of Law.*

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**Phillip Young**

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On Jul 14, 2021, at 3:22 PM, Hahn, W.Patton <[phahn@bakerdonelson.com](mailto:phahn@bakerdonelson.com)> wrote:

Thanks. We will review and get back to you promptly.

On another note, in an effort to resolve disputes related to MPT's Tennessee proof of claim, attached please find (1) a proposed amended proof of claim; (2) a proposed annex to that proof of claim; and (3) the exhibits to the annex/proof of claim. The breakdown of the amount is on the page 3 of the word document; we have schedules documenting how each of those amounts was calculated and can discuss sharing those with you as well if you or Ms. Lemeh have any questions.

These documents are sent to you in an effort to resolve disputes related to MPT's Tennessee proof of claim and we would ask that you and Ms. Lemeh keep them confidential.

After you and Ms. Lemeh have reviewed, let me know if you have any questions, need additional information, wish to discuss, or otherwise how you would like to proceed.

Patton

**W. Patton Hahn**

**Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C.**  
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**From:** Phillip Young <[phillip@thompsonburton.com](mailto:phillip@thompsonburton.com)>  
**Sent:** Wednesday, July 14, 2021 12:12 PM  
**To:** Hahn, W.Patton <[phahn@bakerdonelson.com](mailto:phahn@bakerdonelson.com)>  
**Subject:** Bucks County / DSI

Patton,

Per our earlier discussion, attached is a draft of a stipulation between the TN Trustee and the DE Trustee concerning allowance and payment of the TN Trustee's claim. Please let me know if you see any issues. I think the plan is to file this by Friday.

**Thompson Burton PLLC**

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